

Equality Impact Assessment for Council Tax

Support

London Borough of Bromley

Part 1: Description of policy change and its relevance to equality

Category of trigger for Impact Assessment: Re-adoption of existing policy

Background

Council Tax Benefit (CTB) was abolished on the 01 April 2013. The Local Government Act replaced CTB for working age claimants with a scheme to be designed by the local authority – Council Tax Support (CTS). Funding was no longer demand led, but based on an estimate of Borough caseloads, with an initial overall budget 10% lower than that of CTB. Residents meeting the state pension credit age being eligible for a separate national scheme to "leave them no worse off than they are now".

Reason for review

Bromley adopted a 2 year scheme in January 2013 for the financial years 2013/14 and 2014/15. The scheme was based on a minimum liability of 8.5% for 2013/14 and 19% for 2014/15. This scheme was retained for 2015/16 before revision to a 25% minimum contribution for 2016/17. It remained at this level for 2017/18, 2018/19, 2019/20, 2020/21, 2021/22, 2022/23 and from 2023/24 it is proposed that the minimum contribution increases to 30% and limited to the maximum liability of a Band D property.

CTS is a local scheme to assist those who are on a low income to meet their Council Tax liability. Individuals apply for CTS and if their income is below a certain level, which takes account of their circumstances, they are eligible for a reduction on their Council Tax bill.

The "generosity" of the scheme has a direct impact on the Authority's finances. Therefore, the cost of the scheme will influence service provision in other areas, reserves and/or the Council Tax level.

Consultation on the scheme for 2023/24

Views on the proposed scheme will be sought from the Greater London Authority and a sample of Bromley households. Those households include current CTS claimants as well as those meeting their Council Tax liability from their own means.

Part 2: Collection of Evidence — what do we know?

Description of data used

In order to assess the impact of this policy change, Bromley has used information from a variety of different sources including:

- Data collected from records from the Council Tax and Housing Benefit systems;
- Census 2011 data;
- Bromley's Budget Strategy & other financial information about the service
- Office for National Statistics (NOMIS)
- Bromley Joint Strategic Needs Assessment 2017

Financial Information and Impact

The impact of this proposed scheme will affect all working-age claimants from the 1/4/23. For the financial year 2023/24 it is proposed that the maximum amount of assistance available to working-age claimants under the CTS scheme will be 70%. Calculations have been supplied based on a minimum liability of 30% using the current years (22/23) Council Tax levels.

Table 1 - Financial Impact of Introduction of Local Scheme

	2022/23 Liability	2022/23 Maximum assistance Pensionable Age	2022/23 Maximum assistance under proposed CTS (30%) + Band D restriction	2022/23 Minimum weekly amount to pay (30%) + Band D restriction
Band A - Full Charge	£1,157.82	£1,157.82	£810.47	£6.66
Band A - with 25% discount	£868.37	£868.37	£607.86	£5.00
Band B - Full Charge	£ 1,350.78	£1,350.78	£945.55	£7.77

Band B - with 25% discount	£1013.09	£1013.09	£709.16	£5.83
Band C -Full Charge	£ 1543.76	£1,1543.76	£1,127.68	£8.88
Band C - with 25% discount	£1,157.82	£1157.82	£845.76	£6.66
Band D - Full Charge	£ 1736.72	£1,736.72	£1,215.70	£9.99
Band D - with 25% discount	£1,302.54	£1,302.54	£911.78	£7.49
Band E - Full Charge	£ 2,122.66	£2,122.66	£1,215.70	£17.39
Band E - with 25% discount	£1,592.00	£1,592.00	£911.78	£13.05
Band F- Full Charge	£2,508.59	£2,508.59	£1,215.70	£24.80
Band F - with 25% discount	£1,881.44	£1,881.44	£911.78	£18.60
Band G - Full Charge	£2894.54	£2,894.54	£1,215.70	£32.20
Band G - with 25% discount	£2,170.91	£2,170.91	£911.78	£24.15
Band H - Full Charge	£3,473.44	£3,473.44	£1,215.70	£43.30
Band H - with 25% discount	£2,605.08	£2,605.08	£911.78	£32.47

Breakdown of current claimants

In order to understand how the proposed changes will impact on different protected groups Bromley has examined data, where available, based on the benefit caseload on 30 October 2022. Data is available on the following: age, gender and disability which are noted in Table 2. There is very limited data available on the ethnic breakdown of current claimants as the appropriate section is seldom completed on the application form.

Table 2 - Breakdown of Current claimants Council Tax Support

Type	Total	Female	Male	Disabled	Disabled female	Disabled male	DLA/PIP Income
Working age - Passported (equalisation definition)							
Single no child dependant	2162	1148	978	725	392	333	1460
Single with child dependant	777	753	24	103	99	4	474
Couple no child dependant	208	N/A	N/A	58	N/A	N/A	177
Couple with child dependant	160	N/A	N/A	33	N/A	N/A	134
Working age - Non Passported							
Single no child dependant	2244	1278	966	344	194	150	685
Single with child dependant	2315	2211	104	101	95	6	538
Couple no child dependant	511	N/A	N/A	79	N/A	N/A	228
Couple with child dependant	148	N/A	N/A	5	N/A	N/A	45
Total Working age	8525	5881	2644	1448	855	593	3741
Pensioner- Passported	3222	2128	1094	1044	719	325	635
Pensioner- Non Passported	1903	1069	834	405	241	164	313
Total Pensioner	5125	3197	1928	1449	960	489	948
Overall Total	13650	9078	4572	2897	1815	1082	4689

The table below provides some additional evidence by protected characteristic that has been used to complete this EIA.

Protected Characteristic	Evidence																																																												
Age	<p>Please see table 2 for detailed breakdown</p> <p>8525 (62.45%) of current claimants are under Pension Credit age and will be affected by the Authority's Council Tax Support policy. <i>Data based on October 2021 caseload. Caseload numbers may fluctuate on a daily basis.</i></p> <p>The data demonstrates that 3092 (36.27%) of current working-age claimants are single parent families with child dependents</p>																																																												
Disability	<p style="text-align: center;">Bromley's population</p> <p>The following table shows the number and percentage of residents aged 16-64 who were deemed economic inactive during the period June 2021 to June 2022. You will note that the percentage of economic inactivity in Bromley is lower; however, a higher proportion is a result of long-term sickness.</p> <p style="text-align: center;">Economic inactivity (June2021- June2022)</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th style="text-align: center;">Bromley (level)</th> <th style="text-align: center;">Bromley (%)</th> <th style="text-align: center;">London (%)</th> <th style="text-align: center;">Great Britain (%)</th> </tr> </thead> <tbody> <tr> <td colspan="5" style="text-align: center;">All people</td> </tr> <tr> <td style="text-align: center;">Total</td> <td style="text-align: center;">26,500</td> <td style="text-align: center;">12.6</td> <td style="text-align: center;">20.3</td> <td style="text-align: center;">21.4</td> </tr> <tr> <td style="text-align: center;">Student</td> <td style="text-align: center;">6,800</td> <td style="text-align: center;">25.6</td> <td style="text-align: center;">34.2</td> <td style="text-align: center;">27.1</td> </tr> <tr> <td style="text-align: center;">looking after family/home</td> <td style="text-align: center;">#</td> <td style="text-align: center;">#</td> <td style="text-align: center;">23.6</td> <td style="text-align: center;">19.7</td> </tr> <tr> <td style="text-align: center;">temporary sick</td> <td style="text-align: center;">!</td> <td style="text-align: center;">!</td> <td style="text-align: center;">1.7</td> <td style="text-align: center;">2.2</td> </tr> <tr> <td style="text-align: center;">long-term sick</td> <td style="text-align: center;">#</td> <td style="text-align: center;">#</td> <td style="text-align: center;">19.8</td> <td style="text-align: center;">25.4</td> </tr> <tr> <td style="text-align: center;">discouraged</td> <td style="text-align: center;">!</td> <td style="text-align: center;">!</td> <td style="text-align: center;">#</td> <td style="text-align: center;">0.2</td> </tr> <tr> <td style="text-align: center;">retired</td> <td style="text-align: center;">6,900</td> <td style="text-align: center;">25.9</td> <td style="text-align: center;">6.7</td> <td style="text-align: center;">13.7</td> </tr> <tr> <td style="text-align: center;">other</td> <td style="text-align: center;">#</td> <td style="text-align: center;">#</td> <td style="text-align: center;">13.8</td> <td style="text-align: center;">11.6</td> </tr> <tr> <td style="text-align: center;">wants a job</td> <td style="text-align: center;">#</td> <td style="text-align: center;">#</td> <td style="text-align: center;">18.8</td> <td style="text-align: center;">18.5</td> </tr> <tr> <td style="text-align: center;">does not want a job</td> <td style="text-align: center;">21,700</td> <td style="text-align: center;">81.6</td> <td style="text-align: center;">81.2</td> <td style="text-align: center;">81.5</td> </tr> </tbody> </table> <p>Source: ONS annual population survey # Sample size too small for reliable estimate ! Estimate is not available since sample size is disclosive</p> <p>Notes: numbers are for those aged 16-64. % is a proportion of those economically inactive, except total, which is a proportion of those aged 16 -- 64</p> <p style="text-align: center;">Breakdown of current working age claimants</p> <p>Please see table 2 for detailed breakdown of information on our current claimants</p> <ul style="list-style-type: none"> • 1448 (16.99%) of current claimants below pension credit age have declared a disability • 3741 (43.88%) are receiving DLA/PIP 		Bromley (level)	Bromley (%)	London (%)	Great Britain (%)	All people					Total	26,500	12.6	20.3	21.4	Student	6,800	25.6	34.2	27.1	looking after family/home	#	#	23.6	19.7	temporary sick	!	!	1.7	2.2	long-term sick	#	#	19.8	25.4	discouraged	!	!	#	0.2	retired	6,900	25.9	6.7	13.7	other	#	#	13.8	11.6	wants a job	#	#	18.8	18.5	does not want a job	21,700	81.6	81.2	81.5
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Working Age Caseload by Band

Row Labels	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H	Total
Couple no children	14	74	259	226	101	31	14	0	719
Couple with children	6	9	112	127	42	9	3	0	308
Single no children	252	1356	1627	886	217	54	14	0	4406
Single with children	42	272	1410	1017	263	70	16	2	3092
Grand Total	314	1711	3408	2256	623	164	47	2	8525

Working Age Disability by Band

DLA/PIP on Claim								
	Band							Total
	A	B	C	D	E	F	G	Total
Couple no children Total	6	39	147	143	57	10	3	405
Couple with children Total	2	5	62	84	20	3	3	179
Single no children Total	106	697	803	428	89	17	5	2145
Single with children Total	26	53	451	367	89	20	6	1012
Total	140	794	1463	1022	255	50	17	3741

Disabled Indicator on claim								
	Band							Total
	A	B	C	D	E	F	G	Total
Couple no children Total	3	16	50	45	18	3	2	137
Couple with children Total	1	2	13	17	5	0	0	38
Single no children Total	60	344	398	205	49	10	3	1069
Single with children Total	4	10	89	74	20	7	0	204
Total	68	372	550	341	92	20	5	1448

<p>Sex</p>	<p style="text-align: center;">Bromley population</p> <p>According to nomis official labour market stats Bromley's population (2020) is 51.83% female and 48.14% male</p> <p style="text-align: center;">Breakdown of current claimants</p> <p>Please see table 2 for detailed breakdown of information on our current claimants</p> <p style="text-align: center;">68.99% of current claimants under pensionable age are female (includes those classed as in a couple)</p> <p>Indicates that women are over- represented amongst our CTS claimants</p>
<p>Gender reassignment</p>	<p>The Council does not anticipate this policy will have a particular equality impact on this protected group.</p>
<p>Pregnancy & Maternity</p>	<p>No specific evidence. We do not anticipate this policy will have a particular equality impact on this protected group.</p>
<p>Race</p>	<p style="text-align: center;">Bromley population - Current claimants</p> <p>As advised earlier, there is very limited data available on the ethnic breakdown of the current claimants as only a few complete the non-mandatory section of the form.</p> <p style="text-align: center;">Borough wide information</p> <p>The 2017 GLA population projection estimates show that 19% of its population is made up of black and minority (BME) groups. This percentage does not include Gypsy Travellers, Bromley has a large settled Gypsy Traveller community living in “brick and mortar” concentrated chiefly in the Crays.</p>
<p>Religion & Belief</p>	<p>No specific evidence. We do not anticipate this policy will have a particular equality impact on this protected group.</p>
<p>Civil Partnerships & Marriage</p>	<p>No specific evidence. We do not anticipate this policy will have a particular equality impact on this protected group.</p>
<p>Sexual Orientation</p>	<p>No specific evidence. We do not anticipate this policy will have a particular equality impact on this protected group.</p>

Part 3 - Analyse of evidence and description of the impact

Characteristic	Actual or likely impacts (negative/positive/no impact) and justification	Actions to be taken to mitigate potential negative impacts (include name of lead and estimated date of completion)
Age	<p>Neutral impact for pension age claimants as the Government has stipulated this group must have their claims assessed as they are now.</p> <p>Given the large number of CTS claimants that are single parent families with dependent children increases in the minimum contribution would have a negative impact on levels of child poverty. It is not possible to evaluate the scale of this impact.</p>	<p>It is proposed a hardship fund be retained for those faced with exceptional circumstances. It is further planned to retain all aspects of the current CTS scheme that provides assistance by way of disregards of income and increased allowances.</p> <p>The Council will monitor the impact on this Client group through monitoring of communications, complaints, appeals, request for discretionary awards</p> <p>Responsible Officer(s) Welfare Reform Manager & Revenues & Benefits Manager — Monitoring to be ongoing</p>
Disability	<p>Any increased level of 'contribution' will have a negative impact on current and future disabled CTS claimants as working age claimants would have to pay more towards their council tax bill.</p>	<p>The proposed Council Tax Support scheme allows for the complete disregard of certain income types such as Disability Living Allowance/PIP and the award of Disability premiums in the benefit calculation. These will be retained to mitigate the impact on those who are disabled. The planned continuation of the hardship scheme for those faced with exceptional circumstances will further alleviate any impact on the disabled.</p> <p>Responsible Officer(s) Welfare Reform Manager & Revenues & Benefits Manager — Monitoring to be ongoing</p>

<p>Sex</p>	<p>Females are disproportionately represented amongst current CTS claimants.</p> <p>Any reduction in the level of assistance given would have a negative impact on current and future working age CTS claimants (regardless of gender) as claimants would have to contribute more towards their council tax bill then they have had previously.</p> <p>Although any change in the scheme would be applied universally (i.e. men and women would face the same reduction in CTS) our evidence makes clear that a greater proportion of current CTS claimants are women and therefore as a protected group women would feel the impact of any change in greater numbers.</p>	<p>Monitoring of the impact on women who claim Council Tax Support will continue. In order to mitigate impact it is proposed that the scheme retains the income disregards and allowances that are predominately received by females for example allowances in respect of child care costs. The planned continuation of the hardship scheme will provide a further safeguard for those faced with exceptional circumstances.</p> <p>Responsible Officer(s) Revenues & Benefits Manager — Monitoring to be ongoing</p>
<p>Gender reassignment</p>	<p>No specific impact identified other than all claimants will have to contribute more towards their council tax bill</p>	
<p>Pregnancy & Maternity</p>	<p>No specific impact identified other than all claimants will have to contribute more towards their council tax bill</p>	
<p>Race</p>	<p>Any reduction in the level of assistance provided would have a negative impact on current and future CTS claimants (regardless of race) as some claimants will have to contribute more towards their council tax bill then they have had previously.</p> <p>There is very limited evidence available to quantify if there will be a differential impact on the different ethnicities.</p>	<p>In order to mitigate any adverse impact is proposed that a hardship fund is retained for those faced with exceptional circumstances.</p> <p>Responsible Officer(s) Revenues & Benefits Manager — Monitoring to be ongoing.</p>

	There is evidence to indicate that BME communities are more likely to be unemployed or in lower paid employment and, therefore, possibly more reliant on CTS. However, there is insufficient evidence on current claimants to demonstrate this is in fact the case in Bromley.	
Religion & Belief	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	
Civil Partnerships & Marriage	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	
Sexual Orientation	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	

Part 5 — Completion and authorisation

Officer completing assessment	Jayne Carpenter, Revenues & Benefits Manager
EIA completed	7/12/22
Officer responsible for monitoring impact	Jayne Carpenter
Date EIA is scheduled to be reviewed	November 2023